

Memorandum

DATE: DECEMBER 29, 2003

TO: Compliance Inspectors, EFOMs, Enforcement Section

FROM: Lamar Bradley

RE: Corrosion Protection added to a tank lined for more than 10 years
(Addendum to March 22, 2001 memo)

It has recently been brought to our attention that some tanks which were lined early to comply with upgrading requirements have already passed the 10-year date for conducting the internal inspection required in rule 1200-1-15-.02(2)(b)ii. That raises the question "What is required if a tank owner has added an impressed current CP system to a lined tank after the 10-year date and did not do an internal inspection or assess the tank?"

In a March 22, 2001 memo, the Division issued the following guidance concerning "Adding Corrosion Protection to a Previously Lined Tank":

"Tank owners may add CP to a previously lined tank to avoid manned entry into the tank to periodically inspect the lining. A December 4, 1995 EPA memo recommends UST integrity be assessed prior to adding CP. Integrity assessment may be done using invasive or non-invasive methods. Tennessee has also established a means of assessing tank integrity, the Tennessee Alternative Procedure (TAP), which utilizes a combination of pre- and post-construction tank tightness testing **and** monthly monitoring. If tank owners choose TAP to ensure the integrity of their UST system, **release detection by means of a monthly monitoring method is mandatory** for all systems assessed with TAP following addition of CP.

The EPA memo states "If the above criteria (described in the memo) are used, then internal lining is no longer considered the sole method of corrosion upgrade and periodic inspection of the lining is not required. If, however, cathodic protection is added to an UST whose integrity was not ensured, then periodic monitoring/ inspection of both the cathodic protection system and lining is required." This means, if an owner adds corrosion protection after a tank is lined and tank integrity is ensured prior to adding CP, no periodic inspection of the lining is required.

If a tank owner adds CP to a previously lined tank, the Division recommends that UST integrity be ensured BEFORE adding CP. This can be done by conducting an assessment of the tank using an invasive or non-invasive method or applying the TAP.

If tank integrity is ensured prior to adding CP, no periodic inspection of the lining is required. If tank integrity has NOT been ensured, periodic lining inspections will be required.

If CP has already been added to a previously lined tank and tank integrity was NOT ensured prior to adding CP, periodic lining inspections will be required until an assessment is done and UST integrity is ensured. After that is done, periodic lining inspections may be discontinued."

Rule 1200-1-15-.02(2)(b)ii requires an internal inspection of a tank lining within 10 years of lining and every 5 years thereafter. The March 22, 2001 guidance anticipated CP being added to lined tanks **before** the 10-year deadline. It describes procedures by which a tank owner may comply with rule 1200-1-15-.02(2)(b)2.(iv) and avoid having to do an internal inspection, but the rules do not provide a waiver of the internal inspection requirement for tanks lined for more than 10 years. Therefore if CP was added to a previously lined tank 10 years or more after the date the lining was applied, records should be checked to see if a lining inspection and an integrity test were done prior to the addition of CP. If not, violations exist. Furthermore, the tank owner is required to have the lining inspected and the tank integrity assessed. Periodic lining inspections will be required until the tank passes an integrity test.

A related situation inspectors may encounter is when no records can be located to establish the date of the tank lining. If there is no way to accurately establish the age of the lining, the Division will presume the lining is 10 years old and an internal inspection will be required. Similarly, if no records can be located to establish the date of CP installation or the last 3-year test of the CP system, a CP system test will be required.